

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	
Lightyear Network Solutions, LLC)	
Petition for Extension and Limited Waiver)	

PETITION FOR EXTENSION OF TIME AND LIMITED WAIVER

Lightyear Network Solutions, LLC (“Lightyear”), pursuant to Section 1.3 of the Commission’s Rules,¹ requests that the Commission grant a limited waiver extending the time for it to comply with the obligations imposed on Lightyear pursuant to Commission Rules 9.5(b) and 9.5(d) adopted in the *First Report and Order* in the above-captioned proceedings.² As explained in detail below, despite having made substantial progress toward meeting the requirements of the *VoIP E911 Order*, Lightyear will be unable to comply fully for all of its customers by the November 28, 2005 deadline. Accordingly, Lightyear requests a nine-month extension of time, but may require additional time depending on the specifics of the VoIP E911 deployment as explained herein, to comply with those obligations. Lightyear also requests expedited consideration of this Petition.

¹ 47 C.F.R. § 1.3.

² *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-36 & 05-196, FCC 05-116 (released June 3, 2005) (“*VoIP E911 Order*”). Commission Rule 9.5 (b) and (c), 47 C.F.R. §§ 9.5(b) and (c), implementing the *VoIP E911 Order* are scheduled to take effect on November 28, 2005.

I. DESCRIPTION OF THE PETITIONER

Lightyear provides a variety of telecommunication services and solutions to commercial and residential customers, including switched and dedicated access 1+ long distance, BizLocalSM phone service, DSL, integrated access services, frame relay, nationwide Internet access (dial-up and dedicated access), calling cards, web page hosting and development services, call analysis software for customized billing reports, multimedia conferencing and other services. Lightyear's Voice over Internet Protocol ("VoIP") service, which is branded as "XSTREAMSM," is an Internet application that enables Lightyear's customers to communicate by voice over the Internet with other users of the service and with users of ordinary telephones on the public switched telephone network. Lightyear currently has approximately 5,800 XSTREAM customers.

Lightyear's VoIP service is portable. As long as a Lightyear customer has access to broadband Internet access, the customer can make use of the service anywhere in the United States or the world. Customers may obtain their broadband Internet access from Lightyear, but they are not required to do so. XSTREAM also allows customers located in one geographic area to use telephone numbers that are associated with another area.

Lightyear has provided a detailed description of its service offerings, with specific emphasis on its VoIP E911 deployment, in its compliance report submitted on the same date as this Petition.³ Pursuant to the definitions adopted in the *VoIP E911 Order*, Lightyear is a provider of interconnected Voice over Internet Protocol ("VoIP") services, as the company: (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the

³ See Letter to Marlene H. Dortch, Secretary, FCC from Russell M. Blau and Ronald W. Del Sesto, Jr., Counsel for Lightyear Network Solutions, LLC, WC Docket No. 05-196 (filed Nov. 28, 2005) ("*Lightyear Compliance Report*").

user's location; (3) requires Internet protocol-compatible customer premises equipment ("CPE"); and (4) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network.⁴

Since the release of the *VoIP E911 Order*, Lightyear has taken a number of steps to comply with the Commission's new rules. Lightyear has substantially met the affirmative acknowledgment requirements set forth in 47 C.F.R. § 9.5(e).⁵ Lightyear also taken significant steps to implement the E911 service requirements established in 47 C.F.R. § 9.5 (b) and (c). Specifically, Lightyear determined that it did not have the resources to independently deploy full E911 service for all its VoIP customers by the Commission's deadline. Accordingly, the Company contracted with third-party vendors to deploy its VoIP E911 solution. That solution is discussed in detail below.

Despite its efforts, Lightyear will not be in full compliance with the requirements of the *VoIP E911 Order* by the Commission's November 28, 2005 deadline. Lightyear therefore requires additional time to implement an E911 solution for all of its customers. Based on the representations of its vendors, Lightyear believes that approximately 85% of its current subscriber base does not yet receive E911 service that complies fully with the *VoIP E911 Order*. Lightyear is planning to transition to another third-party VoIP E911 vendor no later than mid-December, 2005, after which the Company believes approximately 28% of its customers will remain without VoIP E911 service. However, Lightyear, together with its vendors, is in the

⁴ See 47 C.F.R. § 9.3.

⁵ Lightyear has filed four status reports addressing the Company's efforts to notify its customers of the limitations associated with its VoIP 911 service and to obtain affirmative acknowledgments from those subscribers stating that they understand those limitations. Those reports were filed in WC Docket No. 04-36 on August 10, September 1, September 22, and October 25, 2005. The Company's October 25, 2005 report informed the Commission that, as of October 19, 2005, Lightyear had obtained affirmative acknowledgement from approximately 98% of its subscriber base. As requested by the Commission, Lightyear will inform the Commission when the 100% threshold is met.

process of implementing an E911 solution that will fully comply. Based on its discussions with and commitments from its vendors, Lightyear currently estimates that it will require an additional nine months to make E911 service available in all areas in which it operates. However, this estimate is predicated on an estimate by Intrado, the underlying VoIP E911 network provider on which Lightyear's vendors rely, that full E911 coverage will be in place by June 2006 for at least one Selective Router per county (where Selective Routers are utilized). There may be some counties that are served by more than one Selective Router. As such, it is impossible for Lightyear to determine whether full coverage will be reached by June 2006, or whether certain customers may still be without E911 service in counties with two or more Selective Routers where Intrado has not interconnected with all available Selective Routers in those areas.

II. SPECIFIC WAIVERS REQUESTED

Lightyear respectfully requests a limited waiver allowing it a nine-month extension of time to implement the following requirements of the *VoIP E911 Order*:

- 1) The requirement to transmit all 911 calls, in all geographic regions served by the Wireline E911 Network, along with the ANI and the caller's Registered Location for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority.⁶
- 2) The requirement to route all 911 through the use of ANI and, if necessary, pseudo-ANI.⁷
- 3) The requirement to provide the Registered Location to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.⁸
- 4) To the extent necessary, Lightyear seeks limited waiver of Section 9.5(b)(1) of the rules to permit Lightyear to continue to market interconnected VoIP service and sign up new

⁶ See 47 C.F.R. § 9.5(b)(2).

⁷ See 47 C.F.R. § 9.5(b)(3).

⁸ See 47 C.F.R. § 9.5(b)(4).

customers during the nine-month period of additional time that Lightyear needs to comply with the requirements of Sections 9.5(b) and (c) of the rules.⁹

III. STANDARD OF REVIEW

Section 1.3 of the Commission's Rules states that the Commission may waive its rules for good cause, which has been interpreted to exist when the facts of a particular case make strict compliance inconsistent with the public interest and when the relief requested will not undermine the policy objective of the rule in question.¹⁰ To prevail, a petitioner must demonstrate that application of the challenged rule would be inequitable, unduly burdensome, or contrary to the public interest.¹¹

The Commission's approach to requests for waivers in the wireless area is illustrative. Section 1.925(b)(3) of the Commission's Rules is comparable to Section 1.3. It provides that the Commission may grant a request for waiver if:

- (i) The underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest; or
- (ii) In view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.¹²

⁹ The Enforcement Bureau's Public Notice explicitly provides that it expects "that such providers will discontinue marketing VoIP service, and accepting new customers for their service, in all areas where they are not transmitting 911 calls to the appropriate PSAP in full compliance with the Commission's rules." Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters, WC Docket Nos. 04-36 & 05-196, DA 05-2945, at 5 (rel. Nov. 7, 2005).

¹⁰ 47 C.F.R. § 1.3. *See Wait Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *see also North-east Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990).

¹¹ *Wait Radio*, 418 F.2d at 1159.

¹² 47 C.F.R. § 1.925(b)(3).

The Commission has also made clear in the wireless E911 context that technical infeasibility and delays beyond the control of the carrier, including the inability to obtain required products or services despite good faith efforts by a petitioner, is reason to grant a waiver.¹³

IV. PETITIONER MEETS THE STANDARD FOR GRANTING A WAIVER

A. Unusual Factual Circumstances Justify the Requested Waivers

Lightyear has long sought a means to provide E911 service to its XSTREAM customers. Because XSTREAM is offered over the public Internet, however, Lightyear cannot practicably limit the geographic locations from which its customers might use the service; therefore, a complete nationwide solution is required for E911 coverage. This poses a much greater challenge for Lightyear than is faced by traditional telecommunications carriers whose networks have a more defined geographic footprint. Even before the issuance of the *VoIP E911 Order*, Lightyear had determined that it would be logistically impossible for Lightyear to contact, negotiate, and contract with all with all the parties (ILECs, PSAPs, and other third-party vendors with access to the underlying Wireline E911 Network) necessary to implement and manage a nationwide network-based E911 solution. In fact, Lightyear had held discussions with Intrado and a number of other third-party solution providers to discuss provisioning of E911 service even before it launched the XSTREAM service.

For various reasons, the E911 solutions offered prior to the issuance of the *VoIP E911 Order* were not adequate. One solution routed emergency calls to the administrative lines of the Public Safety Answering Points (“PSAPs”), which does not meet the Commission’s VoIP E911 routing requirements. Lightyear continued to evaluate potential E911 solutions up to and after

¹³ *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket No. 94-102, Order, FCC 05-79, released April 1, 2005 (“*Wireless E911 Tier III Second Waiver Order*”) at P 10.

the release of the *VoIP E911 Order*. In May 2005, Lightyear intensified its discussions with Level 3 Communications, Inc., its underlying carrier for VoIP services, about the services Level 3 would have in place to satisfy the *VoIP E911 Order*. Lightyear currently uses the VoIP E911 solution provided by Level 3 in all areas where that vendor provides coverage. Simultaneously, however, Lightyear initiated discussions with other service providers such as MCI, Inc., Volo Communications, Inc., and Vox Communications, Inc. to determine if any of those companies had a VoIP E911 solution. Lightyear quickly determined that no single company had a complete VoIP E911 solution that complied with the Commission's rules.

After months of discussions, Lightyear finally contracted with Telefinity Corporation ("Telefinity") in September 2005 to provide an E911 solution. Lightyear expects to finalize its transition to Telefinity's service by no later than mid-December, 2005. Lightyear settled on Telefinity because other VoIP E911 solutions reviewed by the Company were inadequate or otherwise incompatible with Lightyear's service. Telefinity uses Intrado's network to provide its VoIP E911 service, offering what they refer to as "VoIP Emergency Call Service" ("vECS"). This service, as noted in the *Lightyear Compliance Report*, provides VoIP telephony companies with Subscribers' Registered Address Location management, web-based updating, Interactive Voice Response ("IVR") updating, and call center services where a live operator will answer failed calls 24-hours a day, seven days a week. Although vECS provides a number of solutions in the provision of E911 services, it is not a complete solution given the lack of complete coverage by Intrado's underlying VoIP E911 network solution. However, through discussions with Telefinity, Lightyear has determined that this solution currently covers approximately 72.2% of Lightyear's customers, whose registered locations are in the majority of the top 20 Metropolitan Statistical Areas ("MSAs") in the continental United States and a few areas outside of the top 20

MSAs. Telefinity and Intrado are working to deploy this solution in more MSAs, which will provide coverage to a greater proportion of Lightyear's customers (and nationwide service area).

Further, the Company's third-party solution provider has undertaken other efforts to meet the Commission's VoIP E911 requirements. For example, Telefinity has worked with its underlying VoIP E911 network provider, Intrado, to interconnect with 154 Selective Routers, provide ANI and Registered Location information to those covered answering points, provide nomadic VoIP E911 services, and provide customers with the ability to update Registered Location information as necessary.

Lightyear has made significant progress in obtaining Registered Location information from its customers, and providing them with an option to modify that information. Significantly, Lightyear has obtained Registered Location information for 100% of its customers. On July 1, 2005, Lightyear completed upgrades to its website and VoIP Account Manager that obtains initial Registered Location information for new subscribers, and allows all customers to provide and update their Registered Location information with the Company. This system is also used for billing, notification and affirmative acknowledgement procedures, and other account status information. Thus, from July 1, 2005 forward, Lightyear has obtained Registered Location information from all new Lightyear customers at the point of service initiation. Lightyear customers can also call a customer care representative to provide updated location information.

Since July 1, 2005, all Lightyear customers have seen the Company's E911 Registered Location information request on the Company's website and Account Manager. On November 16, 2005, Lightyear sent all current customers an e-mail noting that the Company will be using the shipping addresses used to send them the CPE used with the Company's service (or ad-

dresses provided at signup if after July 1, 2005) for their Registered Location information, and that they should review and update the address on file with Lightyear if appropriate.

When Lightyear transitions to Telefinity's VoIP E911 service, the companies will exchange customer location information, and Lightyear will send another notice to its customers explaining Telefinity's service, and again requesting that they review their Registered Location information. Lightyear will have to redesign its Registered Location information processes to meet Telefinity's service practices. For example, Lightyear currently only uses one Registered Location per customer. However, transition to Telefinity's service will allow Lightyear customers to utilize up to five locations, as well as one "variable" location that customers can use when using the service nomadically. As such, Lightyear will have to redesign its internal Registered Location systems to allow for this new feature. According to information provided by Telefinity, once Lightyear transitions to that company's E911 service, subscribers can update their Registered Location by either: (a) using Telefinity's website, or (b) using the Telefinity "Dash911" telephone touch tone (IVR) system to either select another pre-registered address that the subscriber may already have on file, or to ask for an operator who will make the address change while the customer is on the phone.

Given the time and effort Lightyear has expended prior to and since the issuance of the obligations of the *VoIP E911 Order*, the Company has demonstrated its commitment to providing its customers full E911 services as soon as possible. In addition, Lightyear, like many VoIP providers, is not able to self-provision a complete E911 solution and must rely on third-party vendors for compliance. As noted above, Lightyear selected Telefinity as its primary E911 vendor because Telefinity was the only company that provided a solution that met Lightyear's specifications. However, like all other industry participants, Telefinity does not yet provide a

nationwide VoIP E911 service and still must arrange for interconnection with a significant number of PSAPs.

Another complicating factor is that Telefinity is dependant on the efforts of third parties to deploy an E911 solution, including RBOCs and PSAPs. Circumstances beyond Telefinity's control impact Lightyear's ability to deploy an E911 solution to its customers. For example, in order to deploy a VoIP E911 solution for nomadic VoIP services, Telefinity requires access to pseudo-ANI ("p-ANI"). As described above and in multiple *ex parte* filings with the Commission,¹⁴ the lack of the appointment of an interim Routing Number Authority has made it impossible for Telefinity to access p-ANI in certain areas of the country, impeding the deployment of a VoIP E911 solution. Also, Telefinity reports that in certain areas, PSAPs are either declining or being advised to decline entering into agreements with VoIP providers due to the lack of legislation protecting VoIP providers and PSAPs from any liability that may result from mistakes that may arise in the routing or handling of 911 calls. As the Commission is aware, wireline and wireless carrier enjoy legal protection that insulate them from liability should emergency calls be mishandled. Neither Telefinity nor Lightyear have the ability to resolve these issues.

The Commission also recognized in the *VoIP E-911 Order* that the timeframe for requiring the deployment of an E-911 solution was "aggressive."¹⁵ In fact, deployment of an E-911 solution for a new technology within 120-days is without precedent. VoIP providers, third-party solution providers, VoIP positioning companies, state and local E-911 officials, and RBOCs are

¹⁴ See, e.g., *Ex Parte* Letter from Robert C. Atkinson, NANC Chair to Thomas Navin, Chief Wireline Competition Bureau, FCC (filed Sept. 8, 2005); *Ex Parte* Letter from David F. Jones, President, National Emergency Number Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 04-36 & 05-196 (filed Nov. 4, 2005); *Ex Parte* Letter from Tom Goode, Associate General Counsel, Alliance for Telecommunications Solutions', to Marlene H. Dortch, Secretary, FCC, WC Docket No. 04-36 & 05-196 (filed Nov. 2, 2005).

¹⁵ *VoIP E911 Order*, ¶ 37.

faced with unique issues to resolve. Additionally, there is no standard in place for the delivery of VoIP E-911 calls.¹⁶ Further, through Lightyear's discussions with Telefinity and other VoIP providers, the Company understands that each RBOC has demonstrated a different level of cooperation in deploying a VoIP E911 solution and has adopted different implementation procedures. The 120-day implementation timeframe has not allowed enough time for the industry to resolve all of these disparate issues in order to develop a comprehensive solution. Given the novel issues that arise in deploying a VoIP E911 solution, coupled with the 120-day timeframe, it was simply not possible for the industry to establish a comprehensive VoIP E911 solution.

As the Commission has found previously, delays that are beyond the control of a provider or the inability of a provider to obtain required products or services despite good faith efforts, provides reason to grant a waiver.¹⁷ In this case, Lightyear has made good faith efforts to obtain an E911 solution that complies fully with the *VoIP E911 Order*, and in fact has made substantial progress toward full compliance, but will not be in full compliance by November 28. Under these conditions, Lightyear respectfully submits that the unusual factual circumstances associated with the deployment of a VoIP E911 solution justify the limited relief Lightyear seeks in this Petition.

¹⁶ See *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, Reply Comments of NENA, WC Docket Nos. 04-36 & 05-196 (filed Sept. 12, 2005) (stating that NENA was still in the process of developing the standard, and has sought industry comments on a preliminary proposal).

¹⁷ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket No. 94-102, Order, FCC 05-79, released April 1, 2005 ("*Wireless E911 Tier III Second Waiver Order*") at P 10.

B. Grant of an Extension of Time and Limited Waiver to Lightyear is in the Public Interest; Strict Enforcement of the November 28 Deadline Will Thwart the Purposes of the Commission's Rules

Strict adherence to the requirements of the *VoIP E911 Order* would be inconsistent with the public interest with respect to Lightyear. Lightyear has made good faith efforts to comply with the requirements and has made substantial progress toward compliance. Moreover, it has a plan in place that ultimately will enable it to comply fully with the Commission's rules. However, for reasons that are largely beyond its control, Lightyear will not be able to provide full E911 service to all of its customers by the November 28 deadline. Demanding strict compliance with the *VoIP E911 Order* will not change that fact or further the Commission's goal of providing E911 to all consumers, but will only punish Lightyear for its efforts to date. It could result in the suspension of service to Lightyear's customers and prohibit Lightyear from accepting new customers. The result very well could be that Lightyear will be less able ultimately to comply with the *VoIP E911 Order*. Customers will remain without E911 service, as Lightyear will not have adequate resources to deploy a ubiquitous E911 solution, and Lightyear's ability to compete in the VoIP market will be weakened. Such a result would not serve the public interest and would thwart the goals of the *VoIP E911 Order* and the Commission's mandate to foster competition. Accordingly, a limited waiver of the requirements of the *VoIP E911 Order* with respect to Lightyear is necessary and is in the public interest.

1. Lightyear's Plan to Achieve Full Compliance

In addition to the steps that it has already taken to implement the requirements of the *VoIP E911 Order*, Lightyear has taken steps to achieve full compliance within a reasonable period. Grant of this Petition will give Lightyear the time and resources to carry out its compliance plan. As previously discussed, Lightyear has contracted with Telefinity to provide an E911 solution to Lightyear. According to Telefinity, that company currently provides access to 154

E911 Selective Routers as of November 28, 2005. The attached Major Market Deployment Map (Attachment A) reflects the major market deployment schedules that Telefinity expects over the following seven months.¹⁸ To reach that goal, Telefinity, directly or through Intrado, still must arrange for interconnection with thousands of PSAPs that are currently not covered. Lightyear will implement the Telefinity provided solution throughout its network as soon as possible after Telefinity makes it available.

2. The Relief Lightyear Seeks is in the Public Interest

In light of the circumstances described above, grant of a limited waiver and extension of time to Lightyear is in the public interest. Lightyear has made good faith efforts to comply with the requirements of the *VoIP E911 Order*. It has met the requirements of Rule 9.5(e) for over 98% of its customers and meets the requirements of 9.5(b) and (c) for approximately 72.2% of its customers. In addition, Lightyear is working closely with its vendors to ensure that all of its XSTREAM customers have full E911 access within a reasonable amount of time.

Customers that dial “911” that are not currently covered by Lightyear’s E911 solution will reach a live operator at Level 3. That operator has access to the customer’s call back number information (ANI), and redirects the customer to the appropriate PSAP. After Lightyear’s transition to Telefinity, customers that dial “911” where no E911 coverage is available will be automatically routed to a Telefinity call center where a live operator will answer failed calls 24-hours a day, seven days a week. The public interest in providing prompt emergency response will be protected by these interim measures until full E911 coverage can be achieved.

By demanding full compliance with the *VoIP E911 Order* by November 28, the Commission will make it more difficult for Lightyear to come into full compliance. Strict adherence to

¹⁸ Note that the market deployment map represent major markets where Intrado/Telefinity have connectivity to at least one Selective Router, ALI steering and the ability to populate ALI.

the *VoIP E911 Order* could require Lightyear to discontinue its services to some customers and to cease accepting new customers.¹⁹ These actions would deprive existing customers of access to Lightyear's VoIP services and destroy Lightyear's relationships with those customers. In addition, the ability of Lightyear to attract new customers would be severely hampered. The loss of current customers and the inability to accept new customers will deprive Lightyear of the ability to maintain or expand its user base and revenues. This would cause Lightyear extreme economic hardship. More important for purposes of this Petition, the loss of those revenues would limit Lightyear's ability to pay for the deployment of E911 service and make it less likely that Lightyear will be able to comply in a timely manner with the requirements of the *VoIP E911 Order*. Such a result would not be in the public interest.

C. Grant of the Petition will not Undermine the Policy Objective of the *VoIP E911 Order*

As discussed above, Lightyear has worked, and is continuing to work, to implement an E911 solution that meets the requirements of the *VoIP E911 Order*. Grant of the Petition will not undermine the policy goal that customers of interconnected VoIP providers have access to emergency services. Lightyear is not requesting an exemption from or indefinite waiver of the rules. Rather, Lightyear merely seeks additional time so that it can meet those requirements fully for all of its customers. In other contexts—for example, wireless E911 and CALEA—the Commission has routinely issued limited waivers and extensions of time despite the significant public interests in the recognition that such limited waivers do not undermine the objectives of those

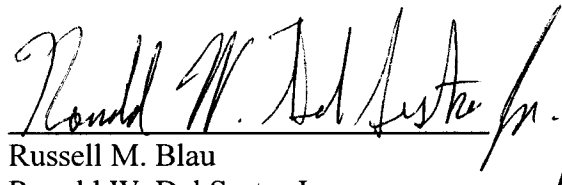
¹⁹ While the Enforcement Bureau has indicated that it is not “requiring” providers to disconnect current customers, the full Commission has not addressed this issue, Commission Rule 9.5 remains fully in effect, and even the Bureau has made no commitment not to pursue enforcement actions against providers that continue to provide service. In particular, it is unclear whether VoIP providers can continue to serve existing customers who change their registered location after November 28. Thus, the fact remains that non-compliant VoIP providers are in the untenable position of courting an enforcement action if they do continue to provide service to existing customers.

rules. The situation here is no different. Lightyear's limited request for relief does not impair the public safety goals that underlie the Commission's new rules. Accordingly, the Commission should grant the Petition.

V. CONCLUSION

For the reasons set forth above, Lightyear respectfully submits that grant of this Petition for extension of time and limited waiver serves the public interest.

Respectfully submitted,



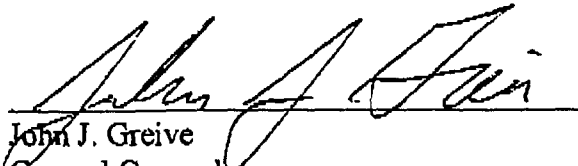
The image shows a handwritten signature in black ink, which appears to read "Russell M. Blau". To the right of the signature, the letters "JRS" are handwritten.

Russell M. Blau
Ronald W. Del Sesto, Jr.
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3000 K Street, N.W., Suite 300
Washington, D.C. 20007
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Counsel for Lightyear Network Solutions, LLC

Filed: November 28, 2005

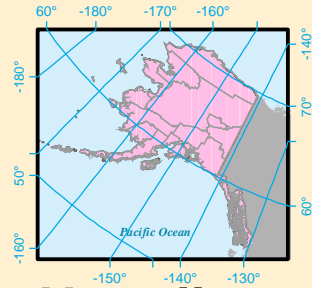
I, John J. Greive, state that I am General Counsel of Lightyear Network Solutions, LLC; that I am authorized to submit the forgoing *Petition for Extension of Time and Limited Waiver* ("*Petition*") on behalf of Lightyear Network Solutions, LLC; that the *Petition* was prepared under my direction and supervision; and I declare under penalty of perjury that the *Petition* is true and correct to the best of my knowledge, information, and belief.


Name: John J. Greive
Title: General Counsel
Lightyear Network Solutions, LLC

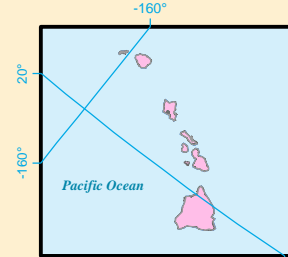
Attachment A

Intrado Major Market VoIP E911 Rollout Map

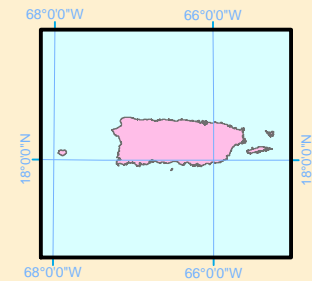
Alaska



Hawaii

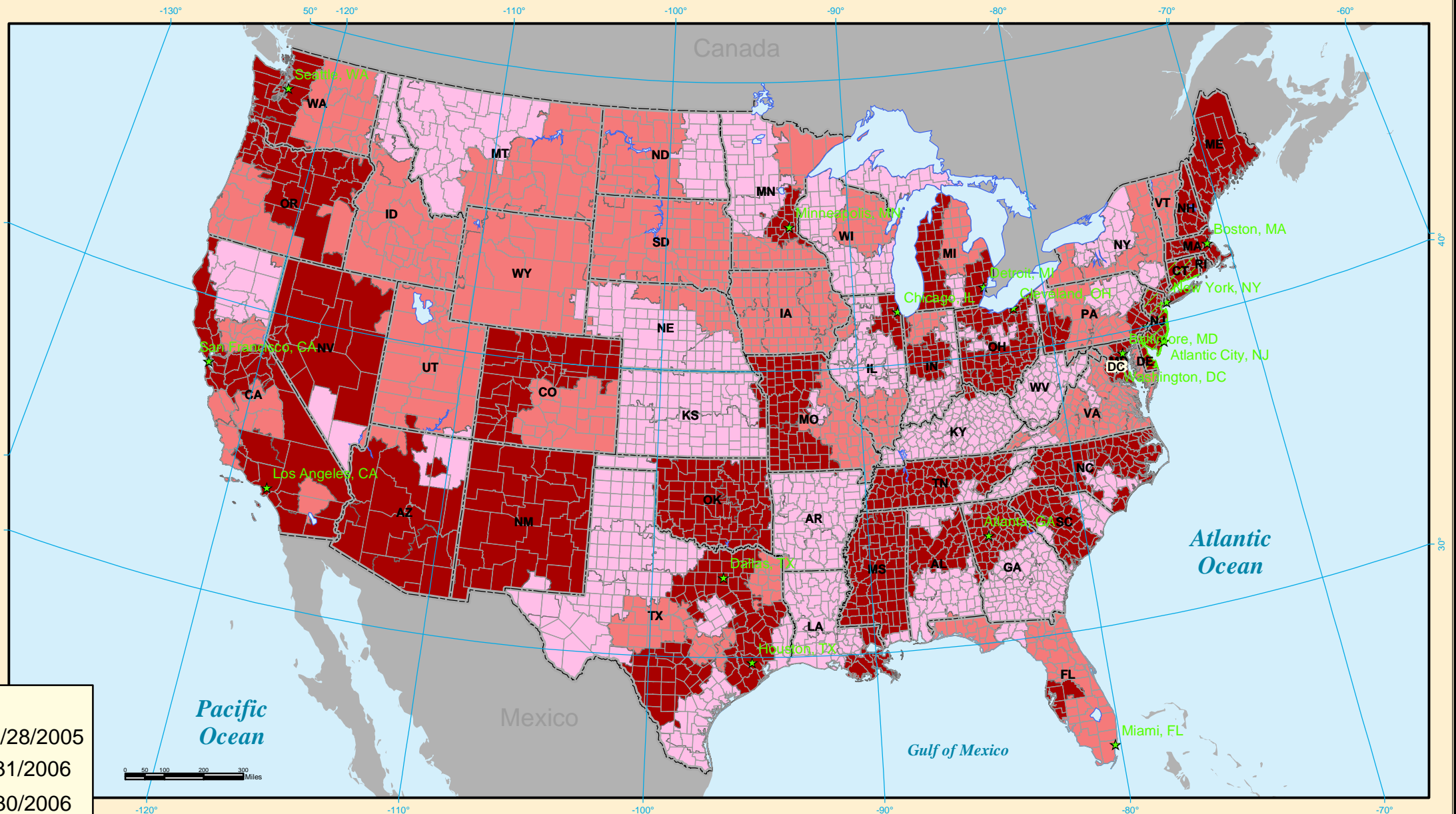


Puerto Rico



Legend

- Planned for 11/28/2005
- Planned for 3/31/2006
- Planned for 6/30/2006
- County Boundary
- ★ or
 Top 20 MSAs
- Lakes



Intrado Major Market Rollout Schedule

Albers Projection
Central Meridian: -96
1st Std Parallel: 20
2nd Std Parallel: 40
Latitude of Origin: 40

Intrado™
Informed Response.™

Intrado
WOS GIS Operations Team
Date: November 2005
Data Source: Meridian, Geode, IPS, ESRI Data
Created in ArcGIS 8 using ArcMap